

41-13 As stated in the draft RMP/EIS in Chapter 2, no surface occupancy associated with mineral lease development would be allowed within 250 feet of fragile geologic formations or caves within AGIs or in the proposed ACECs. Also, as stated in the draft on page 2-4, energy and minerals leasing and mineral materials sale is discretionary. Environmental review is required for approval of a lease application or sale and stipulations to protect other resources may be required. Locatable mineral development is governed by our surface management regulations (CFR 3809) to prevent unnecessary or undue degradation of Federal lands. The AGIs and ACECs are adequately protected by these restrictions.

41-14 In Alternatives C and D and Sub-Alternative D, mineral material sales and free use would be prohibited within the proposed Dry Cataracts National Natural Landmark. Although saleable mineral materials are limited in the planning area and prohibiting their use in the Dry Cataracts area would further limit their availability, the economic analysis does not deal with this limitation since other suitable sources appear to be available.

41-15 The soils portions of the EIS have been expanded for the final. Cumulative erosion rates are not available. Estimates of present and future erosion rates by allotment have not been included in the EIS. They would be of limited value for a general land use plan. T-levels for this area average two to three tons/acre/year. T-levels are of limited value for determination of acceptable erosion rates in an area such as this where soil accumulates through wind deposition rather than forming in place from parent material.

See the discussion on page 3-32 of the final EIS for more information.

41-16 Soil erosion rates were calculated as explained in Appendix I. Wind erosion classes were taken from USDA, Agricultural Research Service (ARS) 1961 p. 14. Water erosion classes were arrived at from BLM Manual 7300 and personal communication with Dave Carter of ARS. The soils portions of the EIS have been expanded for the final. See the discussion on page 3-32 of the final EIS for more information.

41-17 See response to comment 41-10.

41-18 We intend to protect and enhance habitat for mule deer and pronghorn. However, IDFG's projected increases for these species may be too optimistic in view of the habitat lost annually to wildfire. A substantial increase in mule deer and pronghorn will require a large increase in the acreage of quality winter range across the southern part of the planning area. Our habitat management plans will outline the projects required for this improvement. The success of these plans

will depend on a high level of funding and a much lower frequency of wildfire--both unlikely events. Thus, we believe our projected population changes are realistic.

41-19 Pronghorn are most seriously limited by wildfire destruction of brush habitat. We see no sure way to increase pronghorn without large expenditures of money for winter habitat improvement and, perhaps, water developments over summer range. Our big game habitat management plans will have a high priority in the planning area for use of wildlife funds.

41-20 Idaho Department of Fish and Game has been consulted about proposals in this RMP from the outset through the present. In addition to the usual public participation opportunities, such as mailouts, we have met with IDFG several times concerning the Monument RMP.

41-21 Mule deer are largely limited by habitat lost to wildfire. We do not believe that forage allocation is the limiting factor. This reasoning is treated on pages 3-3 and 3-4 in the draft RMP/EIS.

41-22 All alternatives would result in increases in sage grouse except Sub-Alternative D, where increased wildfire would be detrimental to sagebrush. The prescribed burns in Laidlaw Park are designed to improve sage grouse brood-rearing habitat.

The greatest enemies of sage grouse in the planning area are wildfire and cheatgrass as discussed in Chapter 3.

Also see response to comment 41-4.

41-23 Deer are not limited by forage allocation, but rather by loss of brush to wildfire. There is plenty of forage already available. See response to comment 41-18.

41-24 We agree that Sand Butte is a unique area worthy of protection. We feel that the area would be adequately protected if designated wilderness by Congress, but this designation is certainly not ensured. Management according to BLM's Interim Wilderness Management Policy should adequately protect Sand Butte until Congress acts on the suitability recommendations. In the proposed RMP, we have proposed designation of Sand Butte as an Area of Geologic Interest with an ORV closure on the butte itself as a fallback plan if Congress decides not to make the Sand Butte WSA a wilderness area. This has been added to Alternatives C and D and Sub-Alternative D in the final EIS on pages 2-31, 2-32, and 2-44. We do not feel ACEC status with its special management emphasis is warranted in this case given a lack of imminent threats to the naturalness of Sand Butte.

41-25 The referenced section on pages 2-28 and 2-29 in the draft RMP/EIS states, "In addition to the Cultural Resource Management Plan discussed for Devil's Corral (L9a) and the Cedar Fields SRMA (L10), two other plans would be prepared: one for the Oregon Trail and one for Wilson Butte Cave." These are the four plans. The plans for Devil's Corral and Cedar Fields SRMA would be prepared for areas L9a and L10, respectively (refer to Maps 3, 4, and 5). The plan for the Oregon Trail would be prepared for pioneer trail segments that still exist. All trail segments shown on Map 8 are not discernable on the ground today. Detailed field work would be necessary to determine surviving segments to be covered by a plan. The plan for Wilson Butte Cave would be prepared for the cave which is not shown on the RMP maps to preserve some anonymity of its location due to the fragile nature of the cultural resources of the site. All these Cultural Resource Management Plans would be prepared following selection of a Resource Management Plan.

41-26 Damage to artifacts by cattle trampling is generally confined to fence lines and watering troughs. Where these are to be constructed, there will be no effect since cultural resources will be identified through inventory and avoided or mitigated.

41-27 The earnings per job is derived from the 1980 employment and earnings for the counties in the Monument Planning Area as reported by the U.S. Department of Commerce, Bureau of Economic Analysis. The earnings per job for range improvements is based on data for the construction industry where the earnings per job is \$22,176 (BEA 1982). Slightly different earnings per job values are calculated from Table J-3 due to rounding of the earnings, jobs, or both. Alternative C would provide 42 full-time equivalents (FTE) for the construction of range improvements. This may be 42 FTEs for one year, 4.2 FTEs for 10 years, 2.8 FTEs for 15 years, etc., depending on the timing of range improvement installation. It is not known how much of the labor for the range improvements will be provided by permittees and how much will be provided by contractors.

41-28 Any correlation between time and grazing fees would be meaningless due to the numerous times the formula for calculating grazing fees has been changed, the latest in 1979 (the first year of our five-year average). The grazing fee went up in 1980 the maximum allowed under P.L. 95-514 (25 percent). Also, the Bureau and the U.S. Forest Service are currently studying grazing fees which, when presented to Congress, could bring about an entirely new grazing fee formula.

41-29 The Taylor Grazing Act does not state that grazing privileges have no capital value. It does not specifically address the issue. What the Act does, however, is establish that the government does not recognize any "right, title, interest, or state on or to the lands." What this, in effect, means is that values that do arise, such as capital values,

are not compensable by the Federal government if such values are lost (thru permit reduction, revocation, etc.). The existence of capital values associated with grazing permits is fairly well documented and, as such, should be analyzed in the impact analysis.

41-30 The ranch budgets developed for the Monument RMP indicate that, on the average, ranchers are currently able to meet their cash operating expenses with at least some funds available for payments on long-term debt and family labor. No judgment on their "health" is made beyond this. The impact section only identifies whether actions directly related to the RMP would place the viability of ranch groups in jeopardy. No attempt is made to ascertain whether other forces (market prices, interest rates, weather, etc.) are or will place the permittees' operations in jeopardy.

41-31 The earnings per job is derived from the 1980 Employment and Earnings for the counties in the Monument Planning Area as reported by the U.S. Department of Commerce, Bureau of Economic Analysis. The earnings per job is based on data for the retail trade industry where the earnings per job is \$9,994 (BEA 1982). Slightly different earnings per job values are calculated from Table J-3 due to rounding of the earnings, jobs, or both. These jobs would be permanent full-time equivalents. Most of the jobs resulting from increased recreational activity would probably be due to new businesses or added employees in existing business, although it is not possible to make any prediction in number of jobs or percentage of total jobs.

41-32 Entries allowed under the Desert Land and Carey acts must meet a test of economic feasibility with no credits for potential farm payment programs. The analysis presented in this RMP is designed to represent the average entry application in the planning area, and as such, does not represent any individual application. Analysis of production increases and their potential impact on farm prices, distributed impacts, and electric system impacts has been added to the text of Chapter 4, Environmental Consequences, in the final EIS. The description of Economic Conditions in Chapter 3 has been expanded. Tables 2-3 and J-3 have also been updated.

41-33 Land transfers were valued at \$100 per acre since it was estimated that this would be the net income to the government from land sales (sale price minus sale costs). This was also the value used for other types of transfers (except agricultural entry) for the following reasons: (1) it is not presently known as to the amount of land that will be sold, exchanged, etc. by disposal type; and (2) it was assumed that if lands can be sold for a net benefit of \$100 to the government, then other types of disposals should have at least that much value. The District's total fiscal year 1984 budget is \$1,573,100 and it manages approximately 2,035,000 acres. These lead to a per acre management cost of \$.77. This does not include the costs associated with fire pre-suppression, suppression, and rehabilitation.

41-34 Other costs associated with BLM management in the planning area are not identifiable to the resource area level in the Bureau's financial management system. In the Bureau's accounting system, the District is the accountable organizational unit and no cost breakdowns beyond that level are provided. Also, the range program is the only area where reasonable estimates of costs and benefits are available. This would make any benefit/cost analysis very inaccurate and incomplete.

41-35 See response to comment 23-1.

41-36 Recreation was adequately addressed in the draft RMP/EIS. See response to comments 41-2 through 41-8.

A section has been added to the text of the final EIS on page 2-11 dealing with the feasibility of re-establishing native vegetation.

Refer to response to comments 41-18 to 41-23 concerning wildlife populations and IDFG plans.

The soils and economic discussions have been expanded for the final EIS.



Department of Energy  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208

AUG 08 1984

By reply refer to SJ

Mr. Ervin Cowley, Project Manager  
Shoshone District  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, ID 83352

Dear Mr. Cowley:

We have reviewed the Monument Resource Management Plan and Draft Environmental Impact Statement (EIS). The following comments on the EIS address concerns in two areas: (1) the need for up-to-date information on utility transmission corridors, and (2) the need for protection of utility land use rights during land transfers.

Existing and Future Corridor Needs

42-1 Concerning existing transmission system corridors, the map in the EIS appears incomplete. Map 12 should be updated to show all utility corridors (34.5 kV and above) in the resource planning area. We have enclosed a map (map 1) which illustrates the Bonneville Power Administration (BPA) and utility transmission systems in the area.

BPA has no immediate plans for new facilities in the area. The proposal to reinforce the Heyburn-Haymill area in 1985, identified in our comments on the Cassia Resource Management Plan Draft EIS, has been rescheduled into the 1990's. This proposal would involve removal and reconstruction of the Heyburn to Haymill portion of Rupert-Heyburn 34.5-kV line with a new 138-kV double circuit line (see map 2, enclosed).

The draft EIS does a good job of recognizing the potential for future transmission system corridors identified by the Western Utility Group in their Western Regional Corridor study. This inventory, involving over 100 public land rights-of-way users, was completed in May 1980.

For your information, we have enclosed a copy of the May 1984 Intertie Corridor Evaluation Report. This preliminary routing and environmental issues document is the product of an intensive 5-month study by a work group of utilities and agencies from Montana, Idaho, Oregon, Nevada, and California.

42-2 Inland Intertie Plan 4A identifies one potential corridor that could affect the resource planning area. This is the corridor from Midpoint to Garrison. It is also shown on map 1, enclosed. The final EIS should make note of this corridor and its proximity (6-8 miles) to the Great Rift Lava Wilderness study area. Plans for the Inland Intertie at this time are speculative; however, the corridors identified should still be considered in future utility land use planning.

Utility Land Use Rights

Utilities and agencies affected by land transfers which involve utility rights-of-way should be notified and involved in the land negotiations. It is important that they be involved not only to protect land rights but also to insure that new uses are compatible.

We appreciate the opportunity to comment on the draft EIS. If you need further information, please contact Wes Kvarsten, Director, Division of Land Resources, at FTS 429-4683 (503-230-4683).

Sincerely,

*Anthony R. Morrell*  
Anthony R. Morrell  
Environmental Manager

Enclosures:  
2 maps  
Intertie Corridor Evaluation Report

Response to Letter Number 42

42-1 In general, rights-of-way have not been identified as an issue and are usually non-controversial. Except for an occasional spur or short crossing of public land, existing 34.5 kv powerlines are confined to private lands. Therefore, they are not shown.

42-2 The text has been changed to make note of the Inland Intertie proposal on page 3-18 of the final EIS.



# STATE OF IDAHO

DEPARTMENT OF HEALTH  
AND WELFARE

Letter Number 43

DIVISION OF ENVIRONMENT  
Statehouse  
Boise, Idaho 83720

August 9, 1984

Charles J. Haszler  
Bureau of Land Management  
Shoshone District  
P.O. Box 28  
Shoshone, ID 83352

Dear Mr. Haszler:

Staff from the Idaho Department of Health and Welfare - Division of Environment (IDHW-DOE) have reviewed the Draft Environmental Impact Statement (DEIS) for the Monument Resource Management Plan. Our comments follow.

In general, IDHW-DOE would support any alternative which maintained or improved water quality in the area. Specific points in the plan which address this concern include:

- 1) Fencing of portions of the Little Wood River stream bank and of isolated tracts of land to minimize water quality impacts from livestock grazing (page 2-57, all alternatives).
- 2) Proposals for brush control and seeding to minimize erosion (page 2-57, Alternatives B, C, and D).
- 3) The protection of fragile soils from erosion as addressed in Alternatives B, C, and D (page 2-59).

IDHW-DOE appreciates the opportunity to review the Draft EIS. Please keep us informed of any progress on this issue.

Sincerely,

Lee W. Stokes, Ph.D.  
Administrator

LWS/SBM:kks

cc: Russ Renk, IDHW-DOE Twin Falls

EQUAL OPPORTUNITY EMPLOYER



Faulkner Land & Livestock, Inc.

ROUTE 2  
GOODING, IDAHO  
83330

Letter Number 44

August 7, 1984

Charles Haszler, District Manager  
Bureau of Land Management  
P.O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Haszler,

Regarding the Draft Monument Resource Management Plan, we wish to offer the following comments:

- (1) We would suggest that all range lands that have a prior history of burning be seeded to crested or hi-crested wheat. This would save taxpayer dollars spent on fire control and would also improve range conditions.
- (2) We feel that Carey Act land applications presently on file for Gooding County should be very closely scrutinized according to economic feasibility. These lands are scattered and would require extensive road work, maintenance, power lines, and other services. The lands in question are mostly lava covered. The water required to put them into production should be used in other areas that offer a longer growing season and soil more conducive to farm production. There are lands available in Ada, Elmore, and Owyhee Counties that would meet these specifications. For these reasons, we feel the vast majority of these applications should be turned down.

Thank you for your consideration of these concerns.

Sincerely,

John Faulkner, President  
Faulkner Land and Livestock



COMMITTEE FOR IDAHO'S  
HIGH DESERT

P.O. Box 732 Mountain Home, Idaho 83647

Letter Number 45

August 6, 1984

Mr. Ervin Cowley, Project Manager  
Monument Resource Management Plan  
Shoshone District BLM  
P. O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Cowley:

The Committee For Idaho's High Desert offers the following comments on the Monument Resource Management Plan, Environmental Impact Statement:

- 1) CIHD endorses ACEC designation for the Substation Tract, Silver Sage Plays, Vineyard Creek, and Box Canyon-Blueheart Springs.
- 2) In addition, CIHD nominates the GOOD condition grasslands of Laidlaw Park, Little Park, and those along the northern and western edges of the Wapi flow as Areas of Critical Environmental Concern. Good condition grasslands survive on only 2% of the Resource Area. CIHD is convinced that these good condition grasslands will be lost as ecological benchmarks unless they are protected as ACEC's. CIHD also nominates any surviving good condition or better class kapukas in the lava flows of the Monument Resource Area. The total acreage of the kapukas is very small, and they are inconsequential for livestock forage.
- 3) CIHD opposes any livestock watering pipelines within Laidlaw Park. Laidlaw Park represents the largest area of good condition grassland in the Resource Area. We would not like to see these good grasslands sacrificed for marginal increases in livestock forage production within Laidlaw Park. Nor should they be sacrificed as a result of any grazing distribution schemes involving adjacent areas or allotments.
- 4) CIHD would like to see proposals for eradicating the chestgrass area in Little Park, which is located in an otherwise good condition grassland. Little Park is isolated by lava flows and would appear to be a good candidate for rehabilitation attempts.
- 5) CIHD opposes any extensive vegetative manipulation in Laidlaw Park. Brush control should be designed to benefit wildlife--especially pronghorns and mule deer--equally with livestock. A program to verify wildlife benefits from manipulations should be established. We would like documentation by expert opinion (i.e., wildlife biologists) that brush removal of more than 15% of Laidlaw Park would be beneficial to browsing wildlife.

- 6) CIHD is amazed that the BLM can propose a 48% increase in grazing forage allocation over actual use, when 70% of the Resource Area is in poor condition and only 8% is even in fair condition. 79% of the Resource Area is stable in this abominable condition or is in a downward trend. The BLM's proposal, and all alternatives except Alternative D and D1 would lock-in the present sorry state of the range for twenty years. Once again the BLM has failed to deal with the cause of the destruction of the public grasslands: livestock grazing. CIHD urges the adoption of Alternative D, although we do not think that it adequately addresses the fundamental problem of destruction of public grasslands by domestic livestock. If the BLM were actually carrying out its multiple use directive, Alternative D1, the no grazing alternative, would contain economically sensible alternatives to grazing. These might be developed around outdoor recreation, tourism, wildlife ranching, agricultural production of native grasses and forbs, outright public purchase of forage allotments, economic redevelopment in surrounding ranching based communities, or other alternatives.
- 7) If livestock grazing must continue, then CIHD urges that 50% of all Range Improvement Funds be used to enhance wildlife habitat as provided under Section 401(b) of the Federal Land Policy and Management Act of 1976. CIHD urges that Range Improvement Funds be used to purchase or create wildlife habitat, especially critical winter range.
- 8) CIHD opposes the widespread transfer of lands from public ownership in the Monument RA. All wildlife habitat losses from transfers should be mitigated at the pre-grazing level of habitat value for the transferred parcel.
- 9) CIHD urges that the Final EIS contain specific proposals for reducing soil erosion to pre-grazing levels. Range Improvement Funds should be used for any structures, seedings, road improvements, etc. that would be required to achieve control of soil erosion. Specific proposals for control of severe erosion should be provided.
- 10) Monitoring trigger levels for declines for pronghorn and mule deer in the proposed Habitat Management Plans are unacceptable. 30% to 50% declines are truly frightening considering that the declines might be a result of irreversible BLM policies, i.e. critical winter range land sales, brush removal, major range developments. 10% declines should be sufficient to trigger remedial actions. Wildlife population declines should be stabilized by increasing wildlife forage allocation on the public lands. Forage allocation to livestock should not continue to be the destabilizing factor in wildlife populations.
- 11) Estimates should be made of the pre-grazing wildlife population in the Resource Area. Proposals should be included in the Final EIS for restoring wildlife to pre-grazing levels. In the absence of other documentation, CIHD must conclude that the present forage in the RA would support approximately 78,333 pronghorns and perhaps 51,250 mule deer:

approximately 100,000 AIM's in RA = 8,333 Animal Units (cow) -  
12 months

Response to Letter Number 45

8,333 AU X 9.4 Antelope\* = 78,333 Antelope  
AU  
8,333 AU X 6.15 Mule Deer\* = 51,250 mule deer  
AU

\* Data from page B-2 of the Bruneseu-Kuna Grazing Draft EIS, Boise BLM, 1982

As the Monument RMP lists a population of only 615 antelope within the RA--less than eight tenths of one percent of the wildlife potential based on the available forage--CIHD must conclude that wildlife are excluded from reasonable multiple use considerations. This would appear to be a violation of Section 401(b) of the Federal Land Policy and Management Act of 1976.

- 45-5 (12) The Pronghorn Winter Range appears to include only about 30% of the actual critical winter range. CIHD must demand that the Final EIS document how the pronghorn populations can be stabilized with potential loss of 70% of their critical winter range.
- 45-6 (13) The RMP should contain site specific, dollar specific, and date of completion information for fenced campgrounds and trailheads within the RA. Specific budget allocations should be included in the Final RMP for personnel required to administer outdoor recreation programs. Consistency with the Idaho State Comprehensive Outdoor Recreation Plan (SCORP) 1983 version should be verified. SCORP indicates that 795 campsites are required for Lincoln and Minidoka counties in the next twenty years.
- 45-7 (14) Sage grouse have declined dramatically in Idaho over the last several decades. The Final EIS should offer proposals for restoring sage grouse to pre-grazing, pre-agricultural levels within the RA.
- (15) CIHD specifically endorses Wilderness designation for Sand Butte WSA, Raven's Eye WSA, Bear Den WSA, Shale Butte WSA, Little Deer WSA, and Shoshone WSA. CIHD would like a proposal for a closure of the way that divides Raven's Eye and Sand Butte. Alternatives exist south of Sand Butte WSA.
- (16) Sand Butte possesses excellent biological diversity in its grassland and must be preserved. Likewise the diversity and isolation of the grasslands south and east of Broken Top Butte in Raven's Eye provide outstanding wilderness values that must be protected.
- 45-8 (17) The Final EIS must contain benefit/cost analysis of proposed grazing projects. These figures should be separated and compared to the benefit/cost of recreation-wildlife-soils-watersheds. Benefit/cost figures should separate Range Improvement Funds from Congressionally appropriated funds.

Respectfully submitted,  
Randall E. Morris, Chairman  
Committee For Idaho's High Desert

The 70 percent loss of critical winter range stated in the letter is not accurate. In Alternative C, if all tracts available for transfer are transferred, only a small fraction of critical winter range would be lost (e.g., less than 5 percent).

- 45-6 See response to comment 41-2.
- 45-7 The major cause of sage grouse decline is loss of sagebrush and forbs to the wildfire-cheatgrass complex. Cheatgrass control projects, fire suppression, seedings which include forbs, prescribed burns in Laidlaw Park, and RMP development are all designed to improve grouse habitat. With major funding, an unlikely event, it may be possible to improve habitat over significant acreage that is now totally without value for sage grouse. But the ecological stability of cheatgrass is very difficult to combat.
- It also appears that sage grouse have a 10-year population cycle. The peak in 1980-1981 was relatively low and went unnoticed by most people. Thus, we have the appearance of low numbers since the last noticeable peak in 1970. We expect numbers to rebound beginning in 1985-1987, and peak again around 1990.
- 45-8 Bureau policy requires that benefit/cost analyses be prepared, on an allotment basis, for range improvements prior to adoption of a final land use plan and publication of the range program summary. Benefit/cost analysis is also done prior to funding of projects in the annual budget.
- At this point, it is not known how much of the funds for range improvements will come from appropriations and how much from the range improvement fund. It is assumed, given current funding levels, that nearly all such funds will come from the range improvement fund.

- 45-1 Laidlaw Park is nearly covered with sagebrush, which is not the limiting factor for wildlife. In fact, browsing big game species are not common in Laidlaw Park and, thus, we are managing far more with sage grouse in mind. Sage grouse habitat in Laidlaw Park is excellent from a brush standpoint. However, there is a shortage of forbs and a lack of cover type diversity. By removing a reasonable proportion of the brush, especially with prescribed burning, we will increase forb production which will benefit sage grouse and big game. Importantly, this will also reduce the chances of a major conflagration in the future. The diversity and maturity of sagebrush is now setting the stage for a major wildfire that could conceivably wipe out nearly all the brush in Laidlaw Park in one or two days.
- 45-2 Reducing soil erosion rates to pre-grazing levels is not feasible. Simply removing livestock from the land would not accomplish this goal. The increase in fire size due to increased fuel load would offset most of the beneficial effects. Halting all human activity to prevent surface disturbance and reduce the incidence of man-caused fires would help. This would include closing all desert roads to public access, prohibiting ORV use, severely limiting other recreational access, and prohibiting Union Pacific Railroad from using their tracks during fire-prone periods. This does not seem reasonable. Re-establishment of perennial vegetation would help, but the difficulty of replacing cheatgrass and the cheatgrass/fire ecological interrelationship has been documented in the text of the final (pages 3-12 and 3-13) and in the response to comment 41-7.
- 45-3 See response to comment 21-2.
- 45-4 Estimates of the pre-grazing wildlife populations are now irrelevant for many species because the loss of habitat to agriculture and urbanization has had a far greater impact on major species than has grazing. Also, the invasion of cheatgrass and the increased frequency of wildfire is far more important to today's populations than grazing. We do not believe that forage availability is the limiting factor for big game (pp. 3-3 and 3-4 in the draft RMP/EIS).
- 45-5 The "critical" winter range data referred to is apparently that from 1983-1984 collected by IDFG. The draft was completed before these data were collected, but we do realize where the "last resort" winter range for mule deer and pronghorn is (p. 3-7 in the draft RMP/EIS). The area identified as Pronghorn Winter Range RMP on Map 15 includes the portions of the pronghorn winter range under BLM administration where our actions can actually benefit wintering antelope. See response to comment 36-5.

Letter Number 46



## SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

August 8, 1984

Ervin Cowley, Proj. Manager  
Monument RMP  
BLM/Shoshone District  
PO Box 28  
Shoshone, ID 83352

Dear Manager Cowley,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I would like to submit the following comments on the Monument RMP.

The Toiyabe Chapter, which has over 2,000 members in Nevada and Eastern California, many of whom use the public lands in the Monument RA, support Alternative D over the other alternatives. We also support wilderness designation for Sand Butte WSA, Raven's Eye WSA, Bear Den Butte WSA, Shale Butte WSA, Little Deer WSA and Shoshone WSA and ACEC designation for the Substation Tract, Silver Sage Playa, Vinyard Creek, and Box Canyon-Bluehart Springs. Many of the areas contain rare and endangered species, pristine vegetation conditions, notable biological diversity, as well as scenic beauty and outstanding opportunities for primitive recreation and solitude.

The Monument RMP was disappointing, on the whole, as the proposal to substantially increase livestock grazing by expensive range improvements for livestock ignores the critical problems of current overgrazing and poor range condition, massive and continual soil erosion, as well as continuing deterioration of wildlife habitat and lack of BLM recreational facilities on Monument's public lands.

The range of alternatives is very poor, with BLM emphasis given to increasing livestock numbers. The Toiyabe Chapter supports an alternative which will restore big game wildlife and sage grouse levels to pre-grazing levels. We oppose the sale of any antelope or deer winter or summer range. Range improvement funds should be used to create and replace winter range destroyed by grazing and wildfires. We oppose any pipelines in Laidlaw Park, until all multiple use interest groups accept BLM assurance that any new grazing will be properly managed and wildlife concerns will be met. We are surprised that BLM would propose introducing grazing in one of the few areas in the District that is still in good condition. No brush removal by herbicides should occur without an EIS or EA with worst case analysis. More attention should be given to developing recreation facilities on the public

LAS VEGAS GROUP  
P.O. Box 19777  
Las Vegas, Nevada 89119

To explore, enjoy, and protect the wild places of the earth...

GREAT BASIN GROUP  
P.O. Box 8096  
University Station  
Reno, Nevada 89507

lands, in line with the Idaho SCORP guidelines. Soil erosion levels are totally unacceptable. Work on reducing soil erosion to pre-grazing levels.

Response to Letter Number 46

46-1 The final EIS should contain cost/benefit analyses of proposed spending. The economic analysis of non-commodity uses (recreation/wildlife/soils/watershed) should be kept separate from grazing costs and benefits. We suspect that the revenues from hunting and other recreational uses of the Monument RA far exceed any income derived from livestock grazing, while the cost ratio between the two uses is reversed.

Thank you for considering our comments.

Sincerely,

Rose Strickland, Chair  
Public Lands Committee of the Toiyabe Chapter

46-1 See Response to comment 45-8.

2

Letter Number 47

Tenneco Minerals  
A Tenneco Company



300 Union Boulevard  
P.O. Box 27F  
Lafayette, Colorado 80227  
(303) 987-6200

August 7, 1984

Ervin Crowley, Project Manager  
Bureau of Land Management  
P.O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Crowley:

This letter is written on behalf of Tenneco Minerals Exploration Company to comment on the draft environmental impact statement and resource management plan for the Monument area, south central Idaho.

We support the BLM preferred alternative plan, under which areas of known mineral potential are recognized and retained for their mineral value.

We wish to stress, however, that the effect of land use planning on mineral and energy resources should be considered over the long term-decades to scores of years. As new technologies are developed, mineral and energy commodities, once non-productive, will become useable resources. Because the time lag between exploration, discovery, and development can be very long, it is important that access and exploration be regulated, but not restricted.

The same processes that caused the recent basalt eruptions make this a region of high heat flow with potential for geothermal energy resources. There is also untested potential for oil and gas reserves beneath the basalts. The subsurface geology of the area is relatively unknown, and a true estimate of buried mineral/petroleum wealth cannot be made at this time.

In light of this untested potential and the inevitable future need for energy resources, we favor a management plan that places minimal restrictions on leasing, exploration and production of mineral and energy resources.

We thank you for the opportunity to comment on this resource management plan.

Sincerely,

TENNECO MINERALS COMPANY

  
Cynthia Cunningham  
Project Geologist

CC/rf

Letter Number 48

4730 Wildrye Dr.  
Boise, ID 83703  
August 8, 1984

Mr. Charles Haszler,  
District Manager  
Shoshone District Office  
Bureau of Land Management  
P.O. Box 28  
Shoshone, Idaho 83352  
ATTN: Ervin Cowley

Dear Mr. Haszler:

I would like to offer the following comments on the proposed Monument Resource Plan. Please include these comments in the final EIS for the RMP.

#### GENERAL COMMENTS

48-1 In general, I found the document well-written and easy to understand. The wilderness and wildlife sections were particularly well-written. The maps were also good, although I don't agree with the classifications on them in certain areas. For example, the Map 11 (Present Vegetation) shows none of the Sand Butte WSA in a natural condition, yet I have seen significant areas of native grasslands within the WSA (a similar problem exists for the Raven's Eye WSA). There appears to be a contradiction between the text and the map in this regard, as well.

48-2 Nowhere in the text did I find a mention of sensitive, threatened, or endangered plant species. Because of the unusual soil conditions which exist within the RA, there is a high likelihood that at a minimum, plants on the State Watch List (the "red book" prepared by the Idaho Natural Areas Coordinating Council) occur on public lands within the RMP area. This needs to be addressed in the final EIS.

#### SPECIFIC COMMENTS

##### Wilderness

48-3 In general, the wilderness section is well-written, and adequately summarizes the resource values of the WSAs. However, the rationale for recommending as non-suitable Bear Den Butte, Little Deer, and Shale Butte is weak. There are virtually no resource conflicts between wilderness designation and other uses for these areas. Also, recreation is not the only value which wilderness designation will protect; I disagree with the rationale that simply because an area is not outstanding for recreation, it should not receive wilderness designation. Wilderness designation will enhance a number of natural resource values, including wildlife habitat, protection of examples of native plant communities, unusual geological formations, and others. A stronger rationale for non-wilderness recommendations

#### Sand Butte

I strongly concur with the BLM's recommendation to designate Sand Butte as wilderness. This is an outstanding area, with sweeping vistas and rolling, broken terrain. As I indicated earlier, there is a discrepancy between what I have seen in the WSA and what is shown on the resource map in terms of vegetation. One of the strongest rationales for protecting the area, in my mind, is the high quality of the native sagebrush grasslands found in the unit. It is a very worthy and important addition to the National Wilderness Preservation System.

#### Raven's Eye

I strongly support your proposed wilderness recommendation for the Raven's Eye WSA. This is a rugged, varied area which provides excellent opportunities for primitive recreation. Again, it will add to the strength of the NWPS.

#### Bear Den Butte

I strongly disagree with your proposed non-suitable wilderness recommendation for Bear Den Butte. The WSA has some exceptional scenic values, and is a natural part of the Great Rift ecosystem (the low-standard road separating it from the rest of the Great Rift is not a major imprint on the area, nor does it diminish the feeling of solitude and vastness felt within the WSA looking east). Wilderness designation for Bear Den Butte will protect some of the only quality areas of Three-tip sagebrush-native bunchgrass, Basin big sage-native bunchgrass, and Wyoming big sage-native bunchgrass in the District. Wilderness designation will protect mule deer and pronghorn antelope habitat, as well as habitat for ferruginous hawk, Swainson's hawk, and other raptors, and many non-game wildlife species as well (much of the habitat for these species will be significantly diminished under the proposed action). Given the importance of preserving the small remnants of the native grassland communities left in the High Desert, and the lack of resource conflicts between wilderness and other uses for the WSA, I strongly urge you to reconsider your recommendation for Bear Den Butte. As I indicated above, I find the rationale that an area should not be recommended suitable for wilderness protection simply because of the difficulty of hiking on the area to be unacceptable. It is completely unacceptable for this WSA, which is 41% grassland and has high ecological value.

#### Little Deer

Many of the same arguments which apply to Bear Den Butte apply to Little Deer as well. There are valuable, and limited, Three-tip sagebrush-native bunchgrass communities in the

northeastern part of the WSA, which wilderness designation would protect. Again, the lack of ease in recreation use of the area does not justify a non-wilderness recommendation for the area.

#### Shale Butte and Shoshone

I support wilderness designation for these areas.

#### Wildlife

I believe that the wildlife reductions allowed under the proposed action are far too high, and should be reduced. The "trigger points" for both mule deer and pronghorn are completely unacceptable. The populations left in the RA are far too small to allow a 30-50% reduction in population under any circumstances. The FEIS should establish more reasonable levels, such as a maximum population reduction of 5-10% before substantial steps are taken to prevent further decline (i.e., delay or cancellation of proposed land sales in critical winter range, cancellation of brush control projects in winter range, etc.).

The population goals for big game species are too low. How was the determination of what winter range to include in the pronghorn and mule deer HMPs made? How were the final big game population goals selected? How were the population threshold triggers selected? A much higher portion of winter range must be included in the HMP to make it meaningful. The FEIS should include a plan to increase pronghorn and mule deer populations above the tiny remnants which survive today. Plantings of bitterbrush and other browse species and rehabilitation of critical ranges should be included in the final plan. Similar goals and actions should be proposed for mule deer.

What is the rationale for the "Unknown population increases would be expected" statement for Swainson's hawk under all alternatives? In particular, how would this occur when the hawk's habitat is being converted to agriculture and other uses through the land disposal programs of each alternative (especially alternatives A and B)?

A fish species which is considered sensitive by the American Fisheries Society is the Wood River sculpin (*Cottus leiopomus*), a fish endemic to the Wood River system. The final EIS should include at least an updated status on this species, as well as a monitoring plan to determine if it is in danger of being classified as "threatened" or "endangered". Fencing of critical habitat areas should also be discussed.

The discussion of riparian areas is difficult to follow, and does not give the reader an adequate overall picture of the riparian resources and planned protection of riparian areas in the RA. How many miles of riparian area are there? How many miles of potential riparian habitat are there (areas which

originally supported riparian communities, but which no longer can as a result of overgrazing, etc.)? How many plays or intermittent lakes? How many have already been fenced, etc.? What is the condition, in miles, of riparian areas in the RA? What kinds of fisheries does the RA support? What is the expected condition, in miles, of each riparian condition class under each of the alternatives? What riparian restoration goals were established (by condition class) for the RMP, and how were they selected? Are there any sensitive or proposed threatened or endangered plants in plays, along the sandy bluff areas along the Snake River, or on other specialized riparian habitats?

#### Special Designations

I strongly support your proposed designation of the Substation Tract, Vineyard Creek, and Box Canyon/Blueheart Springs as Areas of Critical Environmental Concern. These are all outstanding areas, deserving of ACEC management emphasis. I would further urge that all three be also designated as Research Natural Areas as well. This would place management of these areas in conformance with international, interagency guidelines for exceptional areas of high scientific value, and enhance their value for education and research. If an area is given ACEC status, does that remove it from possible future land disposal or transfer? If so, this ought to be included in the FEIS.

I was disappointed by your recommendation not to designate the Silver Sage Playa tract as an ACEC. Even though other examples of this community exist elsewhere in southern Idaho, there are very few high-quality examples to be found, and none are currently protected. Given the status of the BLM planning cycles for those areas with suitable potential for RNA or ACEC representation of this community, it appears unlikely that any of this habitat will be given ACEC protection within the next 15-20 years. Hence, the significance of protecting the Silver Sage Playa site is much greater. Have any rare plant inventories been conducted on the site? Given the very small acreage involved (only 10 acres) and the complete lack of conflict with other use, the FEIS must include a stronger justification for not designating the area as an ACEC.

I support designation of the Little Wood River SRMA. However, I believe it's size should be increased to 3,061 acres. Again, the benefits for expanding the SRMA far exceed the opportunity costs of doing so.

I strongly support the Sand Butte ORV closure (L3). I still have not been able to see, on the ground, the tracks which led to this area being deleted from the original Sand Butte WSA, and the thought of having a peninsula of non-wilderness land adversely impact the high wilderness quality of the remainder of the WSA has been a constant frustration. I am pleased that you are managing the area in a manner consistent with the wilderness and other natural resource values which it supports.

I support the other special designations proposed, including establishment of the Dry Cataracts National Natural Landmark, protection for the Devil's Corral, and the Snake River Rim recreation management area.

#### Livestock

This was the most difficult section of the DEIS to understand, particularly because the site-specific projects and the impacts of those projects was not spelled out. It was difficult to tell from the maps how extensive proposed range development projects were, and timelines for the projects. From the information given, I would like to make the following comments:

1) I oppose all the brush control and pipeline projects within the Great Rift WSA in allotment 1206. To recommend developments in this area prior to Congressional consideration of the WSA is inappropriate. In addition, the grassland fringe around the Rift is one of its most significant ecological and wildlife values. Given the importance of maintaining the integrity of the ecosystem and protecting the remaining good-quality wildlife habitat in the RA, I oppose range developments in this area.

2) I oppose the new road proposed within the Sand Butte WSA in allotment 711. I believe this will adversely impact the wilderness values of the area, as well as opening up good wildlife habitat to increased use by cattle.

3) I believe the extensive development program proposed for Laidlaw Butte is unacceptable. This area has the great majority of good-quality wildlife habitat left in the RA; to destroy it for marginal increases in cattle numbers is unacceptable. The impacts of greatly increasing livestock grazing on the best remaining native vegetation in the RA should be fully assessed in the FEIS, including impacts on deer and pronghorn winter and spring/fall range, fawning areas, reproductive success, sage grouse populations, ecological diversity, and similar concerns.

The FEIS needs to include a full benefit-cost analysis of the proposed range development program. Overall, I support Alternative D, which I think best maintains the land in a sustained-yield manner. Thank you for this opportunity to comment.

Sincerely,

Don R. Boccard  
Bruce R. Boccard